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Attorneys for Plaintiff, Matthew Alexander,  
for himself and other members of the general  
public similarly situated

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

Matthew Alexander,

Plaintiff,

vs.

GNLV, Corp.

GNL, Corp.,

Defendants.

Docket No. 2:13-cv-02005-LDG-CWH

**ORDER RE: MOTION TO  
FILE UNDER SEAL  
PLAINTIFF MATTHEW  
ALEXANDER'S REPLY IN  
SUPPORT OF HIS MOTION TO  
COMPEL**

Plaintiff Matthew Alexander, for himself and other members of the general public similarly situated, by and through undersigned counsel hereby moves the Court for an entry of an Order to file under seal Plaintiff Matthew Alexander's Reply in Support of His Motion to Compel. As support for this Motion, Plaintiff states as follows:

1           1.       The parties have agreed to abide by the terms of a proposed protective order, until  
2 such time as the parties seek and receive an Order from the Court stating otherwise or the parties  
3 come to a different agreement.

4           2.       Pursuant to the terms of the proposed protective order, parties that produce  
5 documents and/or provide deposition testimony in this litigation are permitted to designate their  
6 documents or deposition transcripts as “Confidential”, “Confidential – Attorney’s Eyes Only” or  
7 “Confidential Personal Information.”  
8

9           3.       Defendants have produced documents and/or deposition transcripts as  
10 Confidential, Confidential – Attorney’s Eyes Only or Confidential Personal Information.

11           4.       Plaintiff is filing a Reply in Support of His Motion to Compel Deposition which  
12 contains information designated as Confidential, Confidential – Attorney’s Eyes Only or  
13 Confidential Personal Information. In order to comply with the terms of the proposed protective  
14 order, Plaintiff requests that the Court allow Plaintiff’s Reply to be filed under seal.  
15

16           5.       Plaintiff believes that the burden is on the Defendants to establish that the  
17 information designated as Confidential, Confidential – Attorney’s Eyes Only or Confidential  
18 Personal Information pursuant to the agreement is entitled to heightened protection. Nonetheless,  
19 Plaintiff requests that the Court file under seal Plaintiff Matthew Alexander’s Reply in Support  
20 of His Motion to Compel so that Plaintiff can comply with the parties’ agreement.  
21

22           6.       Plaintiff has attached the Declaration of Christopher D. Dandurand to this Motion  
23 as further support for his Reply.

24           7.       Accordingly, Plaintiff respectfully requests that the Court enter an Order filing  
25 Plaintiff Matthew Alexander’s Reply in Support of His Motion to Compel under seal.  
26  
27  
28

Dated: November 17, 2014

**STUEVE SIEGEL HANSON LLP**

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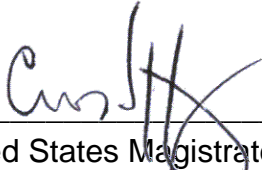
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**ATTORNEYS FOR PLAINTIFFS**

**ORDER**

IT IS SO ORDERED.

  
United States Magistrate Judge  
Dated: November 18, 2014

**CERTIFICATE OF SERVICE**

Pursuant to Fed. R. Civ. P. 5(b), I hereby certify that on November 17, 2014, a copy of the foregoing document was served via email to the following:

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Attorneys for Defendants

/s/ Christopher D. Dandurand  
Attorney for Plaintiff

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Docket No. 2:13-cv-02005-LDG-CWH

**DECLARATION OF  
CHRISTOPHER D. DANDURAND**

I CHRISTOPHER D. DANDURAND declare upon personal knowledge and upon  
penalty of perjury, that the following is true and correct to the best of my knowledge,  
information, and belief:

1. My name is Christopher D. Dandurand I am an attorney at Stueve Siegel Hanson  
LLP representing Matthew Alexander in the above captioned case.

2. I have personal knowledge of the facts stated herein and respectfully submit this  
declaration in support of Plaintiff's Reply in Support of his Motion to Compel.

4. Exhibit 2 is a true and correct copy of excerpts of the deposition of Thomas Zorbas, corporate representative for Epicor, taken September 23, 2014.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, information and belief.

/s/ Christopher D. Dandurand  
Christopher D. Dandurand